

September 26, 2024

Fadumo Abdi Ibrahim Ahmed, Authorized Agent
Gold Childcare Center
1622 Central Ave NE Ste B
East Grand Forks, MN 56721

License Number: 1110680 (Child Care Center)

ORDER OF CONDITIONAL LICENSE

Dear Fadumo Abdi Ibrahim Ahmed:

The Department of Human Services (DHS) is placing your license to provide at Gold Childcare Center, 1622 Central Ave NE Ste B, East Grand Forks, MN 56721, on conditional status for two years, beginning September 26, 2024. This means you must meet certain conditions to maintain your license, detailed below. This order is based on your noncompliance with Child Care Center licensing requirements. Details of our findings are also provided below. Our next steps and your options are also detailed.

REASON FOR THE CONDITIONAL LICENSE

On June 5, 2024, DHS licensors conducted a licensing review at your facility located at 1622 Central Ave NE Ste B, East Grand Forks, MN 56721. As a result of this licensing visit, the DHS licensors determined that your program failed to comply with the laws and rules that apply to licensed Child Care Centers, citing 43 violations. DHS has considered the nature, chronicity, and severity of these violations, as well as the health, safety, and rights of children by the program.

Nature and Severity: On June 5, 2024, a DHS licensor determined 43 licensing violations. Nineteen of the 43 violations are repeat violations for which you were previously cited. Numerous violations are related to the health and safety of children, including failure to comply with:

- Staff qualifications - teacher, director
- Requirements to supervise children
- Requirements of age category grouping
- Staff training requirements, including orientation, cardiopulmonary resuscitation (CPR), first aid, and in-service hours
- Infant safe sleep requirements
- Requirements for hazardous items to be inaccessible to children
- Requirements to follow USDA guidelines

- Requirements to maintain children's records
- Requirement to maintain staff records

Chronicity: Your program received its license on May 19, 2023. Since that time, your program has demonstrated a history of noncompliance with licensing rules and statutes. The information below summarizes this history:)

- September 26, 2024 Conditional License (this order): 46 violations (19 repeat)
- February 23, Correction Order: 32 violations

Due to the serious and chronic nature of these violations, and the conditions in the program, which impact the health and safety of children in your care, your license to provide Licensed Child Care services is placed on a conditional status.

Licensing Violations

DHS determined that your program failed to follow licensing rules and statutes, as described below.

STAFF QUALIFICATIONS AND TRAINING

1. Violation: The program did not have documentation on site to show that 1 of 1 (SP4) staff persons met the:
 - education requirements of the director job classification for which the staff person was employed (SP4); and
 - experience requirements of the director job classification for which the staff person was employed (SP4).

Rule Violated: Minnesota Rules, part 9503.0031, subpart 1; and part 9503.0120, item B

2. Violation: The program did not have documentation on site to show that 1 of 2 (SP4) staff persons met the:
 - education requirements of the teacher job classification for which the staff person was employed (SP4); and
 - experience requirements of the teacher job classification for which the staff person was employed (SP4).

Rule Violated: Minnesota Rules, part 9503.0032, subpart 2; and part 9503.0120, item B

3. Violation: The required in-service training had not been completed for 4 of 4 (SP1, SP2, SP3 and SP4) individuals (director, staff persons, substitutes, or unsupervised volunteers) for the previous concluded calendar year. In-service training did not include the required number of in-service training hours for SP1, SP2, SP3 and SP4 for calendar year 2023.

Statute Violated: Minnesota Statutes, section 245A.40, subdivision 7

4. Violation: The program did not comply with cardiopulmonary resuscitation (CPR) training requirements. Documentation was not available on site to show that 1 of 4 (SP4) individuals (director, staff persons, substitutes, or unsupervised volunteers) had satisfactorily completed the required pediatric CPR training including the treatment of obstructed airways and a hands-on skill assessment within the previous two years (SP4).

Statute/Rule Violated: Minnesota Statutes, section 245A.40, subdivision 4 and Minnesota Rules, part 9503.0120, subpart D

5. Violation: The program did not comply with first aid training requirements. Documentation was not available on site to show that 1 of 4 (SP4) individuals (director, staff persons, substitutes, or unsupervised volunteers) completed pediatric first aid training within the previous two years (SP4).

Statute/Rule Violated: Minnesota Statutes, section 245A.40, subdivision 3 and Minnesota Rules, part 9503.0120, subpart D

SUPERVISION

6. Violation: Staff did not supervise the children at all times (School Age).
 - o At approximately 9:31 a.m., three children left the school age classroom and ran throughout the hallway alone. (School Age classroom)
 - o At approximately 11:17 a.m., a child was walking throughout the hallway alone and unsupervised while a staff person washed another child's hands.

Supervision occurs when a program staff person is accountable for the child's care and is within sight and hearing of a child at all times, so that the program staff person can intervene to protect the health and safety of the child.

Rule/Statute Violated: Minnesota Statutes, section 245A.02, subdivision 18 and Minnesota Rules, part 9503.0045, subpart 1, item A

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule/statute.

INFANT CARE

7. Violation: During the program's regular hours of operation infants were mixed with other age categories.

Throughout the duration of the licensing visit, DHS licensors observed a staff person bring an infant aged child with them to the school age classrooms at different times throughout the day. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0040, subpart 3, item B, (1)

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

8. Violation: The program did not comply with diaper changing area requirements. The diaper change area did not have a smooth nonabsorbent diaper changing surface and floor covering (Infant).

Rule Violated: Minnesota Rules, part 9503.0140, subpart 11

9. Violation: The program did not have written dietary instructions from each infant's parent. Three of three children enrolled in the infant classroom was missing dietary instructions.

Rule Violated: Minnesota Rules, part 9503.0145, subpart 7, item A

10. Violation: Each infant's feeding schedule was not available in the food preparation area. Three of three children enrolled in the infant classroom did not have feeding schedules available in the food preparation area.

Rule Violated: Minnesota Rules, part 9503.0145, subpart 7, item B

11. Violation: Each infant's bottle was not labeled with the child's first and last name.

There were two unlabeled bottles in the bottle warmer. (Infant classroom)

Rule Violated: Minnesota Rules, part 9503.0145, subpart 7, item D

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

12. Violation: The required crib safety inspections were not completed on a monthly basis.

Crib safety inspections were not completed in August of 2023. (Infant classroom)

Statute Violated: Minnesota Statutes, section 245A.146, subdivision 4

13. Violation: The program did not comply with the requirements for reducing the risk of sudden unexpected infant death. The program did not place each infant to sleep in a crib directly on a firm mattress with a fitted crib sheet that fits tightly on the mattress and overlaps the mattress so it cannot be dislodged by pulling on the corner with reasonable effort.

Three crib sheets were wrinkled and could be dislodged from the crib mattress by pulling on it with reasonable effort. (Infant classroom)

Statute Violated: Minnesota Statutes, section 245A.1435, paragraph (b)

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same statute.

BEHAVIOR GUIDANCE

14. Violation: The license holder did not see that behavior guidance policies and procedures were carried out.

At approximately 9:42 a.m., a staff person told the children in the classroom that if they did not sit quietly and watch television, they would not be allowed to go to the playground. Upon further conversation with the staff person, it was determined that children have to earn going outside in the afternoon by listening all morning. Consequences for children must be immediate and directly related to their behavior. Not allowing children to go outside hours after not listening is not an appropriate consequence per DHS behavior guidance policy and procedure requirements. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0055, subpart 1, F

PHYSICAL ENVIRONMENT

15. Violation: The program did not comply with cleanliness requirements; the indoor space was not clean. (Toddler and Infant classrooms)

- o The crib sheet on Crib 3 was visibly dirty. (Infant classroom)
- o The bouncy seat cover was visibly dirty. (Infant classroom)
- o There were ants in the far corner of the toddler classroom near the door to the storage room. (Toddler classroom)
- o Children's blankets were stored on top of each other. This is not a clean and sanitary way to store children's personal items. (Toddler classroom)
- o There was a layer of dust on a ceiling tile directly over the changing table. (Toddler classroom)

As defined in Minnesota Rules, part 9503.0005, subpart 9, clean means 'free from dirt or other contaminants that can be detected by sight, smell, or touch.'

Rule Violated: Minnesota Rules, part 9503.0140, subpart 9

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

16. Violation: The program did not comply with toilet room cleaning requirements.

- o toilet rooms were not cleaned daily;
- o training chairs were not emptied, washed with soap and water, and disinfected after each use; and toilets and seats were not washed and disinfected when soiled or least daily.
- o The toilet seat was visibly dirty with black spots and smudges. (School Age classroom)
- o A toilet training seat was visibly dirty with a layer of dirt and grime. (School Age classroom)
- o The walls of the bathroom were visibly dirty with water stains, dirt and grime. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0140, subpart 10

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

17. Violation: Equipment and furniture were not in good repair.

A toilet training seat was broken. (Toddler classroom)

Rule Violated: Minnesota Rules, part 9503.0140, subpart 19

18. Violation: Areas used by the children were not in good repair.

- A pipe and valve were protruding from the wall, causing the drywall around it to crumble. (Facility)
- There were holes in the wall under the sink at a height accessible to children. (Infant classroom)
- The drywall under the HVAC vent was cracked and peeling. (Toddler classroom)
- The trim around the floor next to the door to the school age classroom was pulled off the wall. (Preschool classroom)
- There was a large hole cut in the ceiling over the eating area with exposed wires hanging out. (Preschool classroom)
- The plexiglass around the HVAC vent was cracked and broken. (Preschool classroom)

Rule Violated: Minnesota Rules, part 9503.0140, subpart 20

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

HAZARDS

19. Violation: The DHS licensor observed that hazardous objects were accessible to children.

- A long, loose electrical cord coming from the dramatic play tool bench was accessible to children along the floor. (School Age classroom)
- Climbing equipment was not placed on a shock absorbing surface and did not provide an appropriate fall zone to minimize the potential risk of injury to children who use the equipment. The climbing equipment and play structure on the playground were placed directly on the grass. (Facility)

Rule/Statute Violated: Minnesota Statutes, section 245A.66, subdivision 2, paragraph (e) and Minnesota Rules, part 9503.0140, subpart 17

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule and statute.

20. Violation: Hot or hazardous surfaces were not shielded or insulated. Two bottle warmers were not secured to the counter and posed a risk to children. (Infant classroom)

Rule Violated: Minnesota Rules, part 9503.0155, subpart 10

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

21. Violation: Electrical outlets were not tamper-proof or shielded.
- o There was one unshielded outlet under the cubby hooks. (Toddler classroom)
 - o There was one unshielded outlet by the door to the toddler classroom. (School Age classroom)
 - o There was one unshielded outlet under the cubby hooks. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0155, subpart 11

22. Violation: A hazardous area was accessible to the children.

The back door to the toddler room was unlocked giving children access to a storage area that contained hazards such as box fans, cords and chemicals.

Rule Violated: Minnesota Rules, part 9503.0155, subpart 15

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

HEALTH AND SAFETY

23. Violation: The 36-month range in age allowed for a group that mixes different age categories was exceeded.

There was a 78-month range in age between the oldest and youngest child in the group. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0040, subpart 3, item B, (2)

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

24. Violation: Each child was not designated in the correct age category. A 21-month-old child was enrolled in the infant classroom. A child designated to an infant classroom should be no older than 18 months of age. (Infant classroom)

Rule Violated: Minnesota Rules, part 9503.0040, subpart 4

25. Violation: The health consultant's yearly review of the program's health policies and practices was not completed yearly. The health consultant's review was not completed in 2023.

Rule Violated: Minnesota Rules, part 9503.0140, subpart 2

26. Violation: The health consultant's monthly review of the infant health policies and practices was not completed monthly. The health consultant's monthly review was not completed in August of 2023 or December of 2023.

Rule Violated: Minnesota Rules, part 9503.0140, subpart 2

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

27. Violation: Food allergy information was not readily available to staff where food is served. It was determined through a review of a child's enrollment documentation that the child had a known food allergy. There was not allergy information readily available where the child is served food. (School Age classroom)

Rule Violated: Minnesota Statutes, section 245A.41, subdivision 1, paragraph (d)

28. Violation: Meals did not comply with the nutritional requirements of the USDA.

At approximately 12:35 p.m., children were served cheese pizza, a peach fruit cup, and a Capri Sun juice pouch for lunch. A vegetable component and fluid milk was required for this meal to meet USDA compliance. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0145, subpart 4

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

29. Violation: Snack did not comply with USDA requirements.

- o Snack did not include two of the four food components identified by the USDA (fluid milk, juice or fruit or vegetable, meat or meat alternate, bread/bread alternate or cereal).
- o A grain based dessert was used as a food component.

At approximately 11:18 a.m., children were served a doughnut only for snack. Two USDA compliant foods and/or fluid milk were required for this snack to meet USDA compliance. (School Age classroom)

Rule Violated: Minnesota Rules, part 9503.0145, subpart 2

30. Violation: Water bottles were used to provide drinking water to children and the program did not have a policy for cleaning and sanitizing water bottles. Water bottles were observed in the kitchen on a drying rack.

Statute Violated: Minnesota Statutes, section 245A.14, subdivision 17

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same statute.

31. Violation: Products to control diaper rash were not labeled with the child's first and last name.
- o There was one unlabeled package of diaper wipes stored on the changing table. (Infant classroom)
 - o There was one unlabeled package of diapers stored on the changing table in the bathroom. (Toddler classroom)

Rule Violated: Minnesota Rules, part 9503.0140, subpart 7, item D

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

32. Violation: The program did not comply with medication storage requirements. A diaper rash product was accessible to children. A package of diaper wipes was accessible to children stored on a low shelf of the changing table. (Toddler classroom)

Rule Violated: Minnesota Rules, part 9503.0140, subpart 7, item E

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

33. Violation: The program did not comply with the reporting requirements for abuse and neglect; staff persons were not aware of the reporting requirements for abuse and neglect.

A staff person stated that he/she would report suspected incidents of abuse or neglect to the office manager rather than reporting it themselves as required.

Rule Violated: Minnesota Rules, part 9503.0130, subpart 1

EQUIPMENT AND SUPPLIES

34. Violation: The program did not provide the children access to interest areas on a daily basis. Children were not provided daily access to a:
- o creative arts and crafts interest area (School Age and Preschool);
 - o science interest area (Preschool and Toddler);
 - o music interest area (School Age and Toddler);
 - o large muscle activities interest area (Preschool); and
 - o sensory stimulation activities interest area (School Age and Toddler).

Rule Violated: Minnesota Rules, part 9503.0045, subpart 2

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

35. Violation: The center lacked the following furnishings, equipment, materials, or supplies:
School Age classroom

- Materials and accessories to support the dramatic play equipment
Preschool classroom
- Materials and accessories to support the dramatic play equipment
Toddler classroom
- Materials and accessories to support the dramatic play equipment

Rule Violated: Minnesota Rules, part 9503.0060

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

CHILDREN'S FILES

36. Violation: Each child's record did not contain all required information:

- 4 of 8 (C4, C6, C7 and C8) children's files reviewed did not contain the names and telephone numbers of anyone authorized to take the child from the program;
- 4 of 8 (C4, C6, C7 and C8) children's files reviewed did not contain the names, addresses, and telephone numbers of two persons to be contacted if a parent cannot be reached in an emergency or when there is an injury requiring medical attention;
- 4 of 8 (C3, C4, C6 and C7) children's files reviewed did not contain documentation of any dietary or medical needs; and
- 4 of 7 (C2, C5, C6 and C8) children's files reviewed did not contain the dates of parent conferences and a summary of conference information.

Rule Violated: Minnesota Rules, part 9503.0125

37. Violation: Four of eight (C2, C3, C5 and C6) children's files reviewed did not contain documentation of a current physical examination received within 30 days of enrollment.

Rule Violated: Minnesota Rules, part 9503.0125, item G; and part 9503.0140, subpart

38. Violation: One of eight (C3) children's files reviewed did not contain a current immunization record, a signed notarized statement of parental objection to the immunization, or a medical exemption.

Rule Violated: Minnesota Rules, part 9503.0125, item G; and part 9503.0140, subpart 5

39. Violation: The program did not develop an Individual Child Care Program Plan for 2 of 2 (C5 and C8) children with a known allergy.

Statute Violated: Minnesota Statutes, section 245A.41, subdivision 1, paragraph (a)

PERSONNEL FILES

40. Violation: A personnel record was not maintained at the program for each staff person (SP4).

Rule Violated: Minnesota Rules, part 9503.0115, item B; and part 9503.0120

POLICIES AND ADMINISTRATIVE RECORDS

41. Violation: The program is required to have stated goals and objectives identified in the child care program plan that promote the physical, intellectual, social, and emotional development of the child. The license holder did not ensure that the child care program plan was carried out.

From approximately 9:31 a.m., until at least 12:00 p.m., children were seated in chairs watching television. No other activities were provided and when children walked away from the television, the staff person in the classroom directed them to sit back down. According to the program's Child Care Program Plan, the preschool schedule stated that children have morning group time from 9:00 a.m.-9:15 a.m., engage in interest areas and small group activities from 9:15 a.m.-11:00am, have large muscle activities from 11:00 a.m.-11:30 a.m. and have lunch from 11:30 a.m.-12:00 p.m. None of the activities outlined in the Child Care Program Plan were observed during the licensing visit.

Rule Violated: Minnesota Rules, part 9503.0045, subpart 1, item F

Repeat Violation: In a Correction Order that DHS issued on March 18, 2024, you were previously found in violation of this same rule.

42. Violation: The program did not evaluate the risk reduction plan each calendar year. There was no documentation to verify that an evaluation of the center's risk reduction plan was done in 2023.

Rule Violated: Minnesota Statutes, section 245A.66, subdivision 3, paragraph (b)

43. Violation: The license holder did not review and update the emergency plan annually. There was no documentation to verify that an annual review and update of the center's emergency plan was done in 2023. "Annual" or "annually" means prior to or within the same month of the subsequent calendar year.

Statute Violated: Minnesota Statutes, section 245A.41, subdivision 3, paragraph (d)

Immediate corrective action required

You must immediately correct the violations cited above. Submit your response through the Provider Hub within 30 days from the date of this letter detailing how compliance has been achieved. You must maintain compliance going forward. If you fail to demonstrate substantial compliance with child care center requirements or with the terms of your conditional license that are provided below, DHS may take an additional licensing action, including revocation, against your license.

Additionally, DHS will not approve a request to increase your child care services from the date of this order until the time your conditional license expires.

CONDITIONAL LICENSE TERMS

In addition to the child care center licensing rules and statutes, you are required to comply with the following terms:

1. Within 15 days from receipt of this order, you must provide written notification of the conditional status of your license to all parents/legal guardians. Prior to providing the written notification to all parents/legal guardians, you must submit the written notice to your DHS licensor for approval. The notification must specify the length of time of the conditional status of your license, the reasons your license was made conditional, and must include either a copy of the Order of Conditional License or an offer to provide a copy of the order upon request.
2. You must develop a detailed supervision plan to ensure that children will be supervised by program staff persons at all times, consistent with the definition of supervision under Minnesota Statutes, section 245A.02, subdivision 18, and in compliance with the risk reduction plan requirements under Minnesota Statutes, section 245A.66, subdivision 2, paragraph (f), (1) through (6). Within 30 days from receipt of this order, you must submit the supervision plan to your licensor for approval.

Within 30 days after the supervision plan is approved by your licensor, you must provide training to all staff on the supervision plan and maintain documentation of the training in each staff person's personnel record. You must also ensure new hires receive the same training and document the training in each new hire's personnel record.

3. Within 45 days from receipt of this order, you must ensure that all staff persons have successfully completed training as required under Minnesota Statutes, section 245A.40, as well as training on your risk reduction plan as required under Minnesota Statutes, section 245A.66, subdivision 3, and infant safe sleep requirements as required under Minnesota Statutes, section 245A.1435. You also must ensure that new hires successfully complete all applicable training. You must maintain documentation of the completed training in each staff person's personnel record.
4. On an ongoing basis while your license is on a conditional status, you must maintain a list of all newly hired employees who will have direct contact with children served by the program. The documentation required under this term must be maintained onsite and made immediately available to DHS upon request. For each individual on the list, you must document the following:
 - the individual's full name;
 - the individual's job title;
 - the date of hire;
 - the date the individual first had direct contact with children served by the program; and
 - the date the background study request was submitted to DHS.

YOUR RIGHT TO REQUEST RECONSIDERATION

You have the right to request reconsideration of this order and the cited violations. Your request must:

- Be in writing
- Clearly state that you are requesting reconsideration of the conditional license
- List each citation you are challenging and identify what is inaccurate or incomplete about the information in the order
- Supply information that is accurate or more complete
- State why you believe your license should not be on a conditional status
- Be made before the deadlines provided below.

If you choose to request reconsideration of this order, you must use the Provider Hub (<https://providerhub.dhs.mn.gov/>) to submit your request. The timeline to request reconsideration began when this order was issued in the Provider Hub. Your request for reconsideration must be submitted in the Provider Hub within 10 calendar days from the date of issue. If you do not meet this deadline, you lose your right to request reconsideration.

Conditional license stayed pending reconsideration

If you request reconsideration within the timeframes described above, the terms of the conditional license will not take effect until a decision is issued by DHS. If the conditional license is affirmed on reconsideration, the terms would take effect on the date of the reconsideration decision and run for two years from that date. You continue to be required to comply with all licensed child care center laws and rules.

Posting of this licensing action

You are required to place this Order of Conditional License in a place that is clearly noticeable to the people receiving services and all visitors to the facility for two years, even if you request reconsideration.

Legal authority for this licensing action

- This action is taken under Minnesota Statutes, section 245A.06, subdivision 1.
- Licensed child care centers are required to follow Minnesota Rules, Chapter 9503.0005 to 9503.0170 and Minnesota Statutes, Chapters 245A, 245C, and 260E.
- The timeline to request reconsideration of the order is provided in Minnesota Statutes, section 245A.06, subdivision 4.
- The requirement to post this order in a clearly visible location is required under Minnesota Statutes, section 245A.06, subdivision 8.
- If a license holder files a timely reconsideration request, the terms of the conditional license are stayed pending a decision by DHS under Minnesota Statutes, section 245A.06, subdivision 4.
- Minnesota Statutes, section 245A.06, subdivision 3 states that DHS may impose additional licensing actions against a license holder that does not correct the violations cited in a conditional license order.

Fadumo Abdi Ibrahim Ahmed, Authorized Agent

September 26, 2024

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Questions

If you have any further questions regarding this matter, you may contact Meg Holmen, Supervisor, at 651-431-6030, ext. 4013.

Sincerely,

A handwritten signature in black ink that reads "Peggy Cunningham". The signature is written in a cursive style with a large, looped "P" and "C".

Peggy Cunningham, Unit Manager

Licensing Division

Office of Inspector General